

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
NEWSCO INTERNATIONAL ENERGY	§	Case No. 19-36767 (DRJ)
SERVICES USA, INC.,	§	
	§	Chapter 11
Debtor.	§	

**EMERGENCY MOTION OF DEBTOR FOR ORDER CONDITIONALLY
APPROVING DISCLOSURE STATEMENT AND SETTING
VOTING AND CONFIRMATION DEADLINES**

TO THE HONORABLE DAVID JONES, UNITED STATES BANKRUPTCY JUDGE:

A HEARING WILL BE CONDUCTED ON THIS MATTER ON NOVEMBER 23, 2020 AT 1:30 P.M CST IN COURTROOM 400, 4TH FLOOR, 515 RUSK, HOUSTON, TX 77002. YOU MAY PARTICIPATE IN THE HEARING EITHER IN PERSON OR BY AUDIO/VIDEO CONNECTION. AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT (832) 917-1510. YOU WILL BE RESPONSIBLE FOR YOUR OWN LONG DISTANCE CHARGES. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE JONES' CONFERENCE ROOM NUMBER IS 205691. YOU MAY VIEW VIDEO VIA GOTOMEETING. TO USE GO MEETING THE COURT RECOMMENDS THAT YOU DOWNLOAD THE FREE GOTOMEETING APP OR CLICK THE LINK ON JUDGE JONES' HOME PAGE ON THE SOUTHERN DISTRICT OF TEXAS WEBSITE. ONCE CONNECTED CLICK THE SETTINGS IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING. HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF THE HEARING. TO MAKE YOUR ELECTRONIC APPEARANCE, GO TO THE SOUTHERN DISTRICT OF TEXAS WEBSITE AND SELECT "BANKRUPTCY COURT" FROM THE TOP MENU. SELECT JUDGES' PROCEDURES, THEN VIEW HOME PAGE FOR JUDGE JONES. UNDER "ELECTRONIC APPEARANCE", SELECT "CLICK HERE TO SELECT ELECTRONIC APPEARANCE" SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE. IF YOU OBJECT TO THE RELIEF REQUESTED OR YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU MUST EITHER APPEAR AT THE HEARING OR FILE A WRITTEN RESPONSE PRIOR TO THE HEARING. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UPOPOSED AND GRANT THE RELIEF REQUESTED.

Newsco International Energy Services USA, Inc., (“Debtor” and “Newsco”) files this *Emergency Motion for an Order Conditionally Approving Third Amended Disclosure Statement and Setting Voting and Confirmation Deadlines* (the “Motion”), pursuant to 11 U.S.C. §§105(d)(2)(vi) and 1125, Federal Bankruptcy Rules 3017 and 9006(c). In support thereof, the Debtor would respectfully show the Court as follows:

I. RELIEF REQUESTED

1. The Debtor requests conditional approval of its Disclosure Statement on an emergency basis, with final approval to be set for hearing combined with the confirmation hearing. The Debtor also requests the establishment of expedited deadlines so that its Plan can be confirmed in mid-December 2020.

2. Counsel has conferred with counsel for the Creditors Committee. The Creditors Committee is unopposed to this Motion.

3. The expedited scheduling is critical to the success of the Debtor’s Plan because an expedited confirmation hearing will enable the Debtor, which is facing a serious liquidity problem, to continue as a going concern and close the transactions contemplated by the Plan.

4. The Disclosure Statement and the Plan are straightforward. A third party is contributing over \$2 million in capital into the company on the effective date of the plan to acquire 100% of the equity of the company. The proceeds will be disbursed in a “waterfall” in accordance with the priorities in the Bankruptcy Code. The balance of funds for the general unsecured creditors will be transferred to a Creditors Trust for administration and distribution on a pro rata basis.

5. The Debtor, which is in the directional drilling business, has had no operations for the past six (6) months due to the cessation of drilling in the industry and has since been funding

limited operations from the collection of accounts receivables and from the sale of miscellaneous assets pursuant to orders of this Court. The Debtor has severely reduced staffing and other costs in order to continue as an ongoing concern while searching for a buyer. The Debtor is delinquent in the payment of its administrative expenses and depleting cash reserves to pay critical operating expenses. For the Debtor to continue on as a going concern, the Debtor needs to obtain confirmation of its Plan.

6. Section 105(d)(2)(vi) of the Bankruptcy Code permits the Court to combine the hearing on approval of the Disclosure Statement with hearing on confirmation of the Plan in order to “further the expeditious and economical resolution of the case,” and “unless inconsistent with another provision of” the Bankruptcy Code. The Debtor submits that conditional approval and combination of the hearings fulfills the Code’s command for expeditious resolution and is consistent with the provisions of the Bankruptcy Code and the proceedings in this case to date.

WHEREFORE, Debtor respectfully request that the Court enter an order (a) conditionally approving the Disclosure Statement; (b) setting a hearing on confirmation of the Debtor’s proposed Plan of Reorganization; (c) setting a deadline for solicitation, voting, and objections on the Debtor’s proposed Plan of Reorganization; and (d) granting such other and further relief as the Court may deem just and proper.

Respectfully submitted,

By: /s/ Stephen A. Roberts
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**ATTORNEYS FOR DEBTOR,
NEWSCO INTERNATIONAL
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing *Debtor's Emergency Motion of Debtor for Order Conditionally Approving Disclosure Statement and Setting Voting and Confirmation Deadlines* was served via CM/ECF to all parties entitled to such notice, and via U.S. first class mail or email, as indicated, to the parties listed on the below Service List on November 19, 2020:

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